

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 15 of the Commission's Rules)	ET Docket No. 14-165
for Unlicensed Operations in the Television)	
Bands, Repurposed 600 MHz Band, 600 MHz)	
Guard Bands and Duplex Gap, and Channel 37,)	
and)	
)	
Amendment of Part 74 of the Commission's Rules)	
for Low Power Auxiliary Stations in the)	
Repurposed 600 MHz Band and 600 MHz Duplex)	
Gap)	
)	
Expanding the Economic and Innovation)	GN Docket No. 12-268
Opportunities of Spectrum Through Incentive)	
Auctions)	

**PETITION OF SPECTRUM BRIDGE
TO STAY THE WHITE SPACE "PUSH" NOTIFICATION REQUIREMENTS
PENDING RESOLUTION OF THE OUTSTANDING REQUESTS FOR RECONSIDERATION**

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The Report and Order adopted by the Commission in this proceeding¹ on August 6, 2015 requires white space database administrators to modify their white space databases to “push” information about changes in channel availability to white space devices within 20 minutes of receiving it. The rules² require the white space database administrators to comply with the push notification requirements no later than December 23, 2016. Correspondingly, the rules³ also require white space devices that do not comply with the push requirement to cease operation no later than December 23, 2016.

Spectrum Bridge believes the push notification requirements are not realizable or workable. The reasons for this belief are well described in the two outstanding Requests for Reconsideration addressing the push notification requirements. Specifically, Google⁴ asserts that the push notification is not feasible to implement. Similarly, NAB⁵ asserts that the push notification will not work as written.

However, there is currently no alternative method available to implement instead of the push notification. The rules do not define any alternate functionality, and the two Requests for Reconsideration propose significantly different alternate methods, both of which were rejected by the Commission in the Report and Order. This makes implementation by a fixed date problematic.

There is risk of harm from the database administrators taking proprietary actions that may result from different or ambiguous interpretations of the rules, which can create confusion for the database administrators, the white space device vendors and those that would review or vet database operations. In particular, if the changes require modifications to deployed white space devices, a non-trivial activity, these may have to be repeated at the conclusion of the Request for Reconsideration process.

No harm will be caused by delaying the implementation deadline. The push notification is to supersede the two vacant television channels currently reserved for wireless microphone use that will no longer be available following the Incentive Auction⁶. The two vacant channels remain available until

¹ FCC 15-99

² §15.711(i)

³ §15.37(j)

⁴ Google Inc. Petition for Reconsideration, filed December 23, 2015, section II

⁵ Petition for Reconsideration of the National Association of Broadcasters, filed December 23, 2015, section II

⁶ FCC 15-99 at 273

the release of the Channel Reassignment PN at the conclusion of the Incentive Auction⁷, and it is unlikely this will occur before 2017.

Spectrum Bridge respectfully requests the Commission to stay the December 23, 2016 implementation date for the push notification requirements pending resolution of the outstanding Requests for Reconsideration, and the selection of a replacement method to replace the push notification. At the same time a process for validating the implementation and an appropriate timeline can be specified.

⁷ FCC 15-99 at 91